

EXHIBIT D

From: [Justin A. Zimmerman](#)
To: [Michelle R. Principato](#)
Cc: tmcnair@mcnairlaw.com; ashley@mcnairlaw.com
Subject: RE: Spencer v. McSparren, et al.
Date: Wednesday, August 7, 2024 3:13:00 PM
Attachments: [image003.png](#)
[image004.png](#)
[image006.png](#)
[Joint Motion to Extend Case Management Deadlines 3-5-24.docx](#)
[Proposed Order for Joint Motion to Extend Case Management Deadlines 3-5-24.docx](#)

Thank you Attorney McNair. Please find attached a draft motion. I don't think we can build into this a contingency based on the August 27 hearing, but I can say we will not object if following the hearing you move to withdrawal from the case.

As to our discovery responses, I will take a look at them next week and we can reconvene if that is acceptable to you.

Please let me know your thoughts on the attached draft motion and we'll get it filed.

Thanks,

Justin A. Zimmerman, Esquire
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From: Michelle R. Principato <MPrincipato@laverylaw.com>
Sent: Wednesday, August 7, 2024 2:24 PM
To: Justin A. Zimmerman <JZimmerman@laverylaw.com>
Cc: tmcnair@mcnairlaw.com; ashley@mcnairlaw.com
Subject: FW: Spencer v. McSparren, et al.

Justin:

Please see the message below from Mr. McNair, in response to the letter sent to him today in the *Spencer* matter.

Thank you,

Michelle Principato

Legal Administrative Assistant to
Murray J. Weed, Esquire
Justin A. Zimmermin, Esquire

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From: Timothy McNair <tmcnair@mcnairlaw.com>
Sent: Wednesday, August 7, 2024 2:20 PM
To: Michelle R. Principato <MPrincipato@laverylaw.com>
Cc: Ashley Rutter <ashley@mcnairlaw.com>
Subject: FW: Spencer v. McSparren, et al.

Please advise Mr. Zimmerman that I sent him this email this morning. If he wants to do the motion, fine. If he wants me to do it, I will ask for 60 days past the confirmation of my authority to represent the bankruptcy estate.

Tim

TIMOTHY D. MCNAIR, ESQUIRE



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